

IOWA TELECOM

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October 5, 2004

VIA ELECTRONIC FILING

Marlene H. Dortch Secretary Federal Communications Commission 445 Twelfth Street, S.W. Washington, D.C. 20554

Re: Errata to Opposition, WC Docket No. 04-347, Petition For Order Declaring

South Slope Incumbent Local Exchange Carrier In Iowa Exchanges Of Oxford,

Tiffin, and Solon

Dear Ms. Dortch:

Please find attached a corrected Attachment B to the Opposition of Iowa Telecommunications Services, Inc. d/b/a Iowa Telecom ("Iowa Telecom's") filed electronically in the above-referenced proceeding. Iowa Telecom inadvertently attached an additional copy of Attachment C in lieu of the Letter From Benjamin H. Dickens, Jr., Blooston, Mordkofsky, Dickens, Duffy & Prendergrast (On Behalf Of South Slope Cooperative Telephone Company), To Jim Larsen, Iowa Telecom (November 20, 2001).

Please call me at (641) 787-2337 if you have any questions or concerns regarding this matter.

Sincerely,

/s/ Edward B. Krachmer Edward B. Krachmer

Director – Regulatory Affairs

Attachment

cc: Original service list

Opposition of Iowa Telecom WC Docket No. 04-347 Filed October 4, 2004

ATTACHMENT B

Letter From Benjamin H. Dickens, Jr., Blooston, Mordkofsky, Dickens, Duffy & Prendergrast (On Behalf Of South Slope Cooperative Telephone Company), To Jim Larsen, Iowa Telecom (November 20, 2001)

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Mr. Jim Larson Iowa Telecom 11 11th Avenue Grinnell, IA 50112

Dear Mr. Larson:

Mr. Brumley of South Slope Cooperative Telephone Company ("South Slope") has transmitted to me Mr. Anderson's request for a written statement of position regarding your company's request for interim number portability ("INP") for two customers of Iowa Telecom. As you are aware, South Slope has not provided the INP and has no plans to do so.

The basis of South Slope's decision in this regard concerns the industry technical standards which have been developed by the North American Number Council ("NANC") and the Industry Numbering Committee ("INC") pursuant to delegation by the FCC. These standards do not require geographic portability of numbers across rate center boundaries and, indeed, the FCC itself has rejected such suggestions. As you are aware, the numbers that you have requested be ported are in a different South Slope rate center than your company's rate center. This information has been in the Local Exchange Routing Guide for several years now. South Slope believes that it would be inconsistent with its own tariffs and the industry standards were it to port the requested numbers. Moreover, such action would eliminate South Slope toll routes both for itself and for third party carriers with whom it has agreements.

We understand that Iowa Telecom has asserted that section 6.2 of the parties' interconnection agreement requires that South Slope adopt Iowa Telecom rate centers (and hence, apparently, that the numbers be ported). The full text of that section, however, makes it clear that such rate center adoption is only for purposes "of ...compensation between the parties and the ability of GTE [Iowa Telecom] to apply its toll tariff ..." South Slope is in compliance with this section, and it dos not require changing rate centers for number portability purposes, particularly where it would affect South Slope's toll tariff.

Mr. Jim Larson November 16, 2001 Page 2

If you become represented by an attorney in this matter, please feel free to have them contact me at their convenience, if your company would like to discuss this further.

Sincerely,

Benjamin H. Dickens,

cc: Mr. Mike Anderson